Ryan L. Ford, WSB# 7-4667, rford@wpdn.net WILLIAMS, PORTER, DAY & NEVILLE, P.C. PO Box 10700 Casper, WY 82602 (307) 265-0700 (307) 266-2306 (facsimile)

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

WEIHAI TEXTILE GROUP IMPORT &)	
EXPORT CO., LTD.,)	
)	Case No.: 2:21-MC-00147-SWS
Petitioner,)	
)	
V.)	
)	
ERUPTION HOLDINGS, INC.,)	
)	
Respondent.)	

MOTION TO SET ASIDE OR REFUSE ARBITRAL AWARD

Eruption Holdings, Inc. (hereinafter referred to as "Eruption"), by and through undersigned counsel, hereby submits its *Motion to Set Aside or Refuse Arbitral Award*.

Pursuant to 9 U.S.C.A. § 207, Article V of the New York Convention, and supporting case law, Eruption respectfully requests the Court set aside or refuse the Petition (Doc. No. 1) in this matter.

Eruption supports this motion by relying upon all the pleadings found in the record, and its *Brief in Support of Motion to Set Aside or Refuse Arbitral Award*, filed concurrently herewith, including its accompanying exhibits.

RESPECTFULLY SUBMITTED this 6th day of August, 2021.

ERUPTION HOLDINGS, INC., a Wyoming Corporation,

Plaintiff.

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of August, 2021, a true and correct copy of the foregoing document was filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to counsel as follows:

Bradley T Cave
HOLLAND & HART
bcave@hollandhart.com

Yan Ge (pro hac vice)
Michael Amberg (pro hac vice)
Wenfeng Su (pro hac vice)
KING & WOOD MALLESONS
geyan@us.kwm.com
michael.amberg@us.kwm.com
wenfeng.su@us.kwm.com

Bing Cheng (pro hac vice) KING & WOOD MALLESONS chengbing@cn.kwm.com

By: <u>/s/ Ryan L. Ford</u>
Ryan L. Ford, WSB# 7-4667